

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROBERT NOCK, an individual,  
on his own behalf and on behalf  
of all others similarly situated,

Plaintiff,

Case No.: 1:23-cv-01042-HR

District Judge: Jennifer H. Rearden

v.

SPRING ENERGY RRH d/b/a  
SPRING POWER & GAS, et al.,

Defendant/Third-Party Plaintiff,

v.

ENDURANCE SALES  
& MARKETING, LLC,

Third-Party Defendant.

\_\_\_\_\_ /

**MOTION TO APPEAR *PRO HAC VICE* AS  
COUNSEL FOR THIRD-PARTY DEFENDANT  
ENDURANCE SALES & MARKETING, LLC**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, the undersigned, Josephine Elizabeth Graddy, hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Endurance Sales & Marketing, LLC, in the above-captioned action.

1. Pursuant to Local Rule 1.3, this motion is accompanied by an affidavit executed by the undersigned, Josephine Elizabeth Graddy, attached hereto as **Exhibit 1** (“Graddy Affidavit”).

2. The undersigned, Josephine Elizabeth Graddy, is in good standing of the bars of the states of New York, Georgia, and Florida. Graddy Aff. ¶ 1.

3. There are no pending disciplinary proceedings against the undersigned, Josephine Elizabeth Graddy, in any state or federal court. Graddy Aff. ¶ 2.

4. The undersigned, Josephine Elizabeth Graddy, has never been convicted of a felony. *Id.*

5. The undersigned, Josephine Elizabeth Graddy, has never been censured, suspended, disbarred, or denied admission or readmission by any court. *Id.*

Wherefore, the undersigned, Josephine Elizabeth Graddy, respectfully requests that the Court enter an order granting this motion and granting her permission to appear pro hac vice in this action as counsel for Endurance Sales & Marketing, LLC.

Dated: March 29, 2024.

Respectfully Submitted,

/s/ J. Elizabeth Graddy  
Josephine Elizabeth Graddy, Esq.  
Sanchez-Medina, Gonzalez, Quesada,  
Lage, Gomez & Machado  
3355 Lenox Road N.E., Suite 750  
Atlanta, Georgia 30326  
Telephone: (404) 863-8789  
Telecopier: (855) 327-0391  
Email: egraddy@smgqlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify service of the foregoing document in that, on the date stamped hereinabove, I filed it electronically with the Clerk of the Court using its Case

Management/Electronic Case Filing system, which will generate notice and a link to a copy of same to all counsel of record who have consented to receive same.

/s/ J. Elizabeth Graddy  
Josephine Elizabeth Graddy, Esq.